

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jaydevi Joshi

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)
Fernando I. Rivera, Esquire of Console Mattiacci Law
110 Marter Avenue, Suite 502 Moorestown, NJ 08057
(856) 854-4000**DEFENDANTS**

Public Consulting Group, Inc.

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- | | |
|--|---|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input checked="" type="checkbox"/> 3 Federal Question
(U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity
(Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

	PTF	DEF	PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 330 Federal Employers' Liability	INTELLECTUAL PROPERTY RIGHTS	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	PERSONAL PROPERTY	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 385 Property Damage Product Liability	SOCIAL SECURITY	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	IMMIGRATION	<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input checked="" type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence		<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General		<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	FEDERAL TAX SUITS	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 950 Constitutionality of State Statutes
		<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- | | | | | | | |
|---|---|--|---|--|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) _____ | <input type="checkbox"/> 6 Multidistrict Litigation - Transfer | <input type="checkbox"/> 8 Multidistrict Litigation - Direct File |
|---|---|--|---|--|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 2000e, et seq. and N.J.S.A. § 10:5-1, et seq.**VI. CAUSE OF ACTION**Brief description of cause:
Plaintiff was discriminated against based on religion in violation of federal and state law.**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.Cv.P.**DEMAND \$**
In excess of \$75,000CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

4/1/2022

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____

APPLYING IFP _____

JUDGE _____

MAG. JUDGE _____

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

JAYDEVI JOSHI
Princeton, NJ 08540

Plaintiff,

v.

PUBLIC CONSULTING GROUP, INC.
148 State St., FL 10
Boston, MA 02109

Defendant.

CIVIL ACTION NO.

JURY TRIAL DEMANDED

COMPLAINT

I. INTRODUCTION

Plaintiff, Jaydevi Joshi (“Plaintiff”), brings this action against her former employer, Public Consulting Group, Inc. (“Defendant”), asserting claims of religious discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* (“Title VII”), and the New Jersey Law Against Discrimination, as amended, N.J.S.A. § 10:5-1, *et seq.* (“LAD”). Plaintiff seeks all damages, including economic loss, compensatory and punitive damages, attorneys’ fees and costs, and all other relief this Court deems appropriate under applicable law.

II. PARTIES

1. Plaintiff is an individual and a citizen of New Jersey.
2. At all times material hereto, Plaintiff is a practicing Hindu.
3. Defendant is a corporation with a principal place of business located in Boston, Massachusetts.
4. Defendant is engaged in an industry affecting interstate commerce and, at all times material hereto, has regularly conducted business in New Jersey.

5. At all times material hereto, Plaintiff worked remotely from her home office in New Jersey or Defendant's New Jersey location.

6. At all times material hereto, Plaintiff was an "employee" of Defendant within the meaning of the statutes which form the basis of this action.

7. At all times material hereto, Defendant acted as an "employer" within the meaning of the statutes which form the basis of this action.

8. At all times material hereto, Defendant acted by and through its authorized agents, servants, workmen, and/or employees acting within the course and scope of their employment or agency and in furtherance of its business.

JURISDICTION AND VENUE

9. The causes of action which form the bases of this action arise under Title VII and LAD.

10. The District Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a), in that the Plaintiff and Defendant are of diverse citizenship and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

11. The District Court has subject matter jurisdiction over Count I (Title VII).

12. This Court has supplemental jurisdiction over Count II (LAD) pursuant to 28 U.S.C. § 1337.

13. Venue is proper in the District Court under 28 U.S.C. § 1391(b), because Defendant resides in this District, and a substantial part of the events or omissions giving rise to the claims occurred within this District.

14. On or about August 2, 2021, Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC") complaining of the acts of discrimination

alleged herein (“Charge of Discrimination”). Attached hereto, incorporated herein, and marked as Exhibit A is a true and correct copy of Plaintiff’s Charge of Discrimination (with personal identifying information redacted).

15. On February 25, 2022, the EEOC issued Plaintiff a Notice of Right to Sue regarding her Charge of Discrimination. Attached hereto, incorporated herein, and marked as Exhibit B is a true and correct copy of this notice.

16. Plaintiff has fully complied with all administrative prerequisites for the commencement of this action.

FACTUAL ALLEGATIONS

17. Plaintiff was hired by Defendant in or about June 2017 as an Executive Director/Project Manager.

18. At Defendant, Plaintiff reported to Heather Gann (“Gann”), Senior Consultant/Project Manager (Christian); Gann reported to Nathan Grossman (“Grossman”), Engagement Manager, and Grossman reported to William “Bill” Mosakowski (“Mosakowski”), Chief Executive Officer.

19. During her tenure at Defendant, Plaintiff consistently demonstrated positive performance and dedication to Defendant and performed her duties in a highly competent manner.

20. In or around the fall or winter of 2019, in one-on-one meetings, unsolicited, Gann would discuss her religion and tell Plaintiff that she and her family were practicing Christians.

21. In or around the fall or winter of 2019, Gann told Plaintiff that she was involved in her church, and taught Sunday school at her church, and that she did not drink alcohol or curse due to her religious beliefs.

22. In or around the fall or winter of 2019, during a one-on-one meeting, Plaintiff told Gann that she was a practicing Hindu who celebrated Diwali, which is the Hindu religion's new year.

23. Upon information and belief, Plaintiff was the only Hindu employee reporting to Gann.

24. On April 4, 2020, in an email sent from Gann's personal email account to Plaintiff's personal email account, Gann told Plaintiff to read an attached letter email and "consider that it is coming from a place of concern" (the "April 4th Letter").

25. The April 4th Letter stated the following:

As a Christian, I have long studied and been aware of all of the teachings in the Bible, specifically, the book of Revelation....

I realize that this is coming from a place of my own beliefs. I'm also not trying to push anything on you, but with today's events unfolding before us, I can't help but think about what my Christian faith teaches about the Lord's Second Coming. I understand to even "unpack" this and give it some serious consideration, you have to have some level of faith and spiritual understanding or desires. We haven't talked much about religion, other what your family background is and what Sara's dad believes, and that I teach Sunday School and I know you're aware I'm pretty active in my church....

I do want to just ask you a simple question ... "Do you know, if you were to die today, where you would spend eternity?"

I realize that's probably coming out of left field, and please don't be offended, I only ask because I've never discussed this with you and I have a burden on my heart to tell you about it. I also know that you CAN have that certainty, AND I care enough about you that I want to ask.

It is possible to know. I know. I accepted Christ as my Savior when I was 14 years old. I haven't lived a perfect life by any means since then, but I do strive to honor Him with my life. I know that my faith is real because I have

seen God's hand work in my heart and in my life SO many times over the years.

I have been feeling quite convicted about not sharing my faith with you since we've worked together for so long and I would be remiss and not at all what I should be- as someone who cares about you- as someone who believes that each of us will spend eternity in either heaven or hell- if I didn't share/ ask you that question.

The truth is, we will all spend eternity somewhere. I understand that religions and religious views differ, and I'm not trying to push mine on you. But, if you have ever pondered that question, or wondered about life after this, the Bible gives us a very clear path to salvation, and I've included it below. I do hope that you'll take the time to review it....

To get the assurance that heaven will one day be your home, there is a very simple process to follow. All you have to do is:

1. Admit that you're a sinner. We all are! Even our "good works" the Bible tells us, are as "dirty rags" in His sight. The Bible tells us, "... there is none righteous, no, not one." Romans 3:10
2. Ask God for forgiveness of your sins and believe in your heart that HE is the only way to salvation and eternal life. "For whosoever shall call upon the name of the Lord shall be saved." Romans 10:13
3. Believe in God's power to save you. We can't save ourselves. "For God so loved the world that He gave his only begotten Son, that whosoever believeth in Him should not perish, but have everlasting life." – John 3:16
4. Pray and ask Him to come into your heart. It's that easy!! I'm not asking you to start going to church, convert over to any "religion", or to do anything else. All we have to do is ask Him to save us and he will! The Bible tells us, "Behold, I stand at the door and knock; if any man hear my voice, and open the door, I will come in to him..." – Revelations 3:20....

Consider for a moment the peace that you can have in your life if you KNEW where you would spend eternity!!

Thank you for allowing me to share this with you. Again, I value you and had this burden to share this with you and I trust that you will take this for what it is, a genuine interest in your soul's eternal security.

26. Plaintiff found Gann's April 4th Letter email to her to be offensive, based on religion, and contributing to the hostile work environment to which she was subjected.

27. Plaintiff did not respond to Gann's email or take any steps to convert to Christianity.

28. Following Gann's April 4th Letter and Plaintiff's refusal to convert to Christianity or express any interest in same, Plaintiff was treated differently and worse, and in a more hostile and dismissive manner than non-Hindu employees were treated. For example, without limitation:

(a) Gann belittled Plaintiff in front of Plaintiff's team, direct reports, and clients.

(b) Gann unjustly criticized Plaintiff's performance, including subjecting her to disciplinary action.

(c) Gann refused to provide Plaintiff with requested support and assistance.

(d) Gann spoke over Plaintiff and did not allow Plaintiff to share her perspective.

29. On April 22, 2021, in a phone call with Gann and Nancy Dalonzo ("Dalonzo"), Human Resources, Defendant terminated Plaintiff's employment, effective immediately.

30. Defendant's stated reason for terminating Plaintiff's employment was unprofessional behavior.

31. Defendant assigned Plaintiff's job duties to less qualified, non-Hindu employees.

32. Before Plaintiff disclosed her religion to Gann and before Gann's April 4th Letter to Plaintiff, Plaintiff had no indication that her job was in jeopardy.

33. On April 22, 2021, following Plaintiff's termination, in an email to Mosakowski and Dalonzo, Plaintiff forwarded Gann's April 4th Letter and stated the following:

I am forwarding you a separate letter - Please take the opportunity to read this email from my boss, Heather Gann, and ask yourselves whether or not this correspondence is allowed? I felt that this was religious harassment, yet I said nothing as I feared the possibility of losing my job.... I feel that [Defendant] talks about anti-discrimination and diversity but in reality, no real change is implemented. Heather [Gann] has several times spoken down to me in public in front of fellow subordinates, as well as seemingly targeting me, as seen by fellow employees. I have been scared about this for the past year or so, but I was going through many personal turmoils hence I kept quiet.... However, as hard as I worked in those 70 hour work weeks, and no matter how much I tried to show my dedication to the company, only my mistakes have been recognized."

32. On April 29, 2021, in an email from Dalonzo, she acknowledged receipt of the Plaintiff's emails, and stated that Defendant would "handle this matter internally."

26. Defendant terminated Plaintiff's employment because of her religion.

27. Defendant did not treat Plaintiff in the same way that it treated similarly situated non-Hindu employees.

28. Plaintiff was subjected to a hostile work environment because of her Hindu religion and/or her refusal to convert to Christianity.

29. Plaintiff's religion was a motivating and/or determinative factor in Defendant's discriminatory treatment of her, including, but not limited to, the hostile work environment to which Plaintiff was subjected and her termination.

30. The discriminatory conduct of Defendant, as alleged herein, was severe and/or pervasive enough to make a reasonable person believe that the conditions of employment had been altered and that a hostile work environment existed, and made Plaintiff believe that the conditions of employment had been altered and that a hostile work environment existed.

31. As a direct and proximate result of the discriminatory conduct of Defendant, Plaintiff has in the past incurred, and may in the future incur, a loss of earnings and/or earning capacity, pain and suffering, embarrassment, humiliation, loss of self-esteem, mental anguish, and

loss of life's pleasures, the full extent of which is not known at this time.

32. Defendant acted with malice and/or reckless indifference to Plaintiff's protected rights and warrants the imposition of punitive damages against Defendant.

33. The conduct of Defendant, as alleged herein, included upper-management involvement and was especially egregious.

34. No previous application has been made for the relief requested herein.

COUNT I
(VIOLATION OF TITLE VII)

35. Plaintiff incorporates herein by reference the above paragraphs as if set forth herein in their entirety.

36. By committing the foregoing acts of discrimination against Plaintiff, Defendant has violated Title VII.

37. Said violations were intentional and with malice and/or reckless indifference to Plaintiff's rights and warrant the imposition of punitive damages.

38. As a direct and proximate result of Defendant's violation of Title VII, Plaintiff has sustained the injuries, damages, and losses set forth herein and has incurred attorneys' fees and costs.

39. Plaintiff is now suffering and will continue to suffer irreparable injury and monetary damages as a result of Defendant's discriminatory acts unless and until this Court grants the relief requested herein.

40. No previous application has been made for the relief requested herein.

COUNT II
(VIOLATION OF LAD)

41. Plaintiff incorporates herein by reference the above paragraphs as if set forth herein in their entirety.

42. By committing the foregoing acts of discrimination against Plaintiff, Defendant violated the LAD.

43. Members of upper management of Defendant had actual participation in, or willful indifference to, Defendant's unlawful conduct set forth herein.

44. Said violations were especially egregious and warrant the imposition of punitive damages.

45. As a direct and proximate result of Defendant's violation of the LAD, Plaintiff has suffered the injuries, damages, and losses set forth herein and has incurred attorneys' fees and costs.

46. Plaintiff is now suffering and will continue to suffer irreparable injury and monetary damages as a result of Defendant's discriminatory acts, and the hostile work environment to which she was subjected unless and until this Court grants the relief requested herein.

47. No previous application has been made for the relief requested herein.

RELIEF

WHEREFORE, Plaintiff seeks damages and legal and equitable relief in connection with Defendant's unlawful conduct, and specifically prays that the Court grant the following relief to the Plaintiff by:

(a) declaring the acts and practices complained of herein to be in violation of Title VII and LAD;

- (b) enjoining and permanently restraining the violations alleged herein;
- (c) entering judgment against the Defendant and in favor of the Plaintiff in an amount to be determined;
- (d) awarding compensatory damages to make the Plaintiff whole for all lost earnings, earning capacity and benefits, past and future, which Plaintiff has suffered or may suffer as a result of Defendant's unlawful conduct;
- (e) awarding compensatory damages to Plaintiff for past and future pain and suffering, emotional distress, mental anguish, humiliation, and loss of life's pleasures, which Plaintiff has suffered or may suffer as a result of Defendant's unlawful conduct;
- (f) awarding punitive damages to Plaintiff under Title VII and the LAD;
- (g) awarding Plaintiff the costs of suit, expert fees, and other disbursements, and reasonable attorneys' fees; and
- (h) granting such other and further relief as this Court may deem just, proper, or equitable including other equitable and injunctive relief providing restitution for past violations and preventing future violations.

Respectfully submitted,
CONSOLE MATTIACCI LAW, LLC

By: *s/Fernando I. Rivera*
FERNANDO I. RIVERA, ESQ.
110 Marter Avenue, Suite 502
Moorestown, New Jersey 08057
Phone: (856) 854-4000
rivera@consolelaw.com

Dated: 4/1/2022

Attorney for Plaintiff

Exhibit A

CHARGE OF DISCRIMINATION		AGENCY <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER
This form is affected by the Privacy Act of 1974; See privacy statement before consolidating this form.			
STATE OR LOCAL AGENCY:			
NAME (Indicate Mr., Ms., Mrs.) Jaydevi Joshi		HOME TELEPHONE NUMBER (Include Area Code) (908) 416-1857	
STREET ADDRESS 30E Chicopee Drive		CITY, STATE AND ZIP Princeton, NJ 08540	
DATE OF BIRTH 11/27/1971			
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP, COMMITTEE, STATE OF LOCAL GOVERNMENT WHO DISCRIMINATED AGAINST ME (If more than one than list below)			
NAME Public Consulting Group Inc.		NUMBER OF EMPLOYEES, MEMBERS > 15	
TELEPHONE (Include Area Code) (609) 275-0250			
STREET ADDRESS 619 Alexander Road, Suite 301		CITY, STATE AND ZIP Princeton, NJ 08540	
COUNTY Mercer			
CAUSE OF DISCRIMINATION (Check appropriate box(es)) <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Sex <input checked="" type="checkbox"/> Religion <input type="checkbox"/> National Origin <input type="checkbox"/> Retaliation <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Other (Specify)		DATE DISCRIMINATION TOOK PLACE <i>Earliest</i> <i>Latest</i> 04/22/2021	
<u>The Particulars Are:</u>			
A. 1. Relevant Work History			
I was hired by Respondent in or about June 2017. I last held the position of Executive Director. I reported to Heather Gann (Christian), Senior Consultant/Project Manager. Gann reported to Nathan Grossman, Engagement Manager. Grossman reported to Bill Mosekowski, Chief Executive Officer.			
Respondent subjected me to a hostile work environment because of my Hindu religion and/or my refusal to convert to Christianity. After I rebuffed my supervisor's attempts to have me convert from Hinduism to Christianity, Respondent treated me differently and worse, and in a more hostile and dismissive manner, and terminated my employment.			
I consistently demonstrated positive performance and dedication to Respondent. I performed my duties in a highly-competent manner.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures		NOTARY - (when necessary for State and Local Requirements)	
I swear of affirm that I have read the above charge and that it is true to the best of my knowledge information and belief.			
I declare under penalty of perjury that the foregoing is true and correct.			
Date: 8/2/21		Charging Party (Signature): 	
		SIGNATURE OF COMPLAINANT	
		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day Month, and year)	

**EEOC Charge of Discrimination
Initials of Charging Party –**

2. Harm Summary

I have been discriminated against because of my religion (Hinduism). Evidence of the discriminatory conduct to which I have been subjected includes, but is not limited to, the following:

- (a) In one-on-one meetings, Gann told me that she and her family were practicing Christians. She told me that she was involved in her church, and taught Sunday school at her church. She told me that she did not drink alcohol or curse due to her religious beliefs.
- (b) In one-on-one meetings, I told Gann that I am Hindu, and told her that I celebrated Diwali, which is the Hindu religion's new year.
- (c) I was the only Hindu employee reporting to Gann.
- (d) On April 4, 2020, in an email from Gann, she told me to read the letter attached to her email and "consider that it is coming from a place of concern." The letter attached to her email stated the following:

[A]s a Christian, I have long studied and been aware of all of the teachings in the Bible, specifically, the book of Revelation. . . .

I realize that this is coming from a place of my own beliefs. I'm also not trying to push anything on you, but with today's events unfolding before us, I can't help but think about what my Christian faith teaches about the Lord's Second Coming. I understand to even "unpack" this and give it some serious consideration, you have to have some level of faith and spiritual understanding or desires. We haven't talked much about religion, other what your family background is and what Sara's dad believes, and that I teach Sunday School and I know you're aware I'm pretty active in my church. . . .

I do want to just ask you a simple question... "Do you know, if you were to die today, where you would spend eternity?"

I realize that's probably coming out of left field, and please don't be offended, I only ask because I've never discussed this with you and I have a burden on my heart to tell you about it. I also know that you CAN have that certainty, AND I care enough about you that I want to ask.

It is possible to know. I know. I accepted Christ as my Savior when I was 14 years old. I haven't lived a perfect life by any means since then, but I do strive to honor Him with my life. I know that my faith is real because I have seen God's hand work in my heart and in my life SO many times over the years.

I have been feeling quite convicted about not sharing my faith with you- since we've worked together for so long and I would be remiss and not at all what I should be- as someone who cares about you- as someone who believes that each of us will spend eternity in either heaven or hell- if I didn't share/ ask you that question.

The truth is, we will all spend eternity somewhere. I understand that religions and religious views differ, and I'm not trying to push mine on you. But, if you have ever pondered that question, or wondered about life after this, the Bible gives us a very clear path to salvation, and I've included it



**EEOC Charge of Discrimination
Initials of Charging Party –**

below. I do hope that you'll take the time to review it. . . .

To get the assurance that heaven will one day be your home, there is a very simple process to follow. All you have to do is:

1. Admit that you're a sinner. We all are! Even our "good works" the Bible tells us, are as "dirty rags" in His sight.
The Bible tells us, "...there is none righteous, no, not one." Romans 3:10

2. Ask God for forgiveness of your sins and believe in your heart that HE is the only way to salvation and eternal life.
"For whosoever shall call upon the name of the Lord shall be saved."
Romans 10:13

3. Believe in God's power to save you. We can't save ourselves.
"For God so loved the world that He gave his only begotten Son, that whosoever believeth in Him should not perish, but have everlasting life." – John 3:16

4. Pray and ask Him to come into your heart. It's that easy!! I'm not asking you to start going to church, convert over to any "religion", or to do anything else. All we have to do is ask Him to save us and he will!
The Bible tells us, "Behold, I stand at the door and knock; if any man hear my voice, and open the door, I will come in to him..." – Revelations 3:20 .
...

[C]onsider for a moment the peace that you can have in your life if you KNEW where you would spend eternity!!

Thank you for allowing me to share this with you. Again, I value you and had this burden to share this with you and I trust that you will take this for what it is, a genuine interest in your soul's eternal security.

- (e) I found Gann's email to me to be offensive, based on religion, and contributing to the hostile work environment to which I was subjected.
- (f) I did not respond to Gann's email or take any steps to convert to Christianity.
- (g) Following Gann's email and my refusal to convert to Christianity or express any interest in the same, I was treated differently and worse, and in a more hostile and dismissive manner than non-Hindu employees were treated.
- (h) Gann belittled me in front of my team, my direct reports, and my clients.
- (i) Gann unjustly criticized my performance.
- (j) Gann refused to provide me with requested support and assistance.
- (k) Gann spoke over me and did not allow me to share my perspective.
- (l) On April 22, 2021, in a phone call with Gann and Nancy Dalonzo, Human Resources, Respondent terminated my employment, effective immediately. The stated reason was unprofessional behavior.
- (m) On April 22, 2021, following my termination, in an email to Mosekowski and Nancy Dalonzo, Human Resources, I stated the following: "I am forwarding you a separate



**EEOC Charge of Discrimination
Initials of Charging Party –**

letter - Please take the opportunity to read this email from my boss, Heather Gann, and ask yourselves whether or not this correspondence is allowed? I felt that this was religious harassment, yet I said nothing as I feared the possibility of losing my job. . . . I feel that [Respondent] talks about anti-discrimination and diversity but in reality, no real change is implemented. Heather [Gann] has several times spoken down to me in public in front of fellow subordinates, as well as seemingly targeting me, as seen by fellow employees. I have been scared about this for the past year or so, but I was going through many personal turmoils hence I kept quiet. . . . However, as hard as I worked in those 70 hour work weeks, and no matter how much I tried to show my dedication to the company, only my mistakes have been recognized." I then separately forwarded to Mosekowski and Dalonzo the April 4, 2020 email and letter attachment that I received from Gann.

- (n) On April 29, 2021, in an email from Dalonzo, she acknowledged receipt of the emails I sent to her, and stated that Respondent would "handle this matter internally."
- (o) Respondent terminated my employment because of my religion and/or my refusal to convert to Christianity.
- (p) Respondent subjected me to a hostile work environment because of my religion and/or my refusal to convert to Christianity.
- (q) Respondent assigned my job duties to less qualified, non-Hindu employees.
- (r) Before I disclosed my religion to Gann and before Gann's April 4, 2020 email and letter to me, I had no indication that my job was in jeopardy.
- (s) Respondent's religious discriminatory conduct and comments have caused me emotional distress.
- (t) Respondent did not target or treat in the same way similarly-situated non-Hindu employees and/or employees who did not refuse to convert to Christianity.

B. 1. Respondent's Stated Reasons

- (a) Respondent has provided no explanation for subjecting me to a hostile work environment because of my religion and/or my refusal to convert to Christianity.
- (b) Respondent's stated reason for terminating my employment, unprofessional behavior, is pretext for religious discrimination.

C. 1. Statutes and Bases for Allegations

I believe that Respondent has discriminated against me based on my religion (Hinduism), in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000(e), *et seq.* ("Title VII"); and the New Jersey Law Against Discrimination, as amended, N.J.S.A. § 10:5-1, *et seq.* ("NJLAD"), as set forth herein.



Exhibit B



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Philadelphia District Office

801 Market St ,Suite 1000

Philadelphia ,Pennsylvania ,19107

(267) 589-9700

Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 02/25/2022

To: Ms. Jaydevi Joshi
30e Chicopee Drive
Princeton, NJ 08540

Charge No: 530-2021-04434

EEOC Representative and email: Legal Unit

(267) 589-9707

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice**. Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 530-2021-04434.

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible**.



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On Behalf of the Commission:

Digitally Signed By: Karen McDonough

02/25/2022

Karen McDonough
Enforcement Manager

Cc:

Nancy Dalonzo

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Please retain this notice for your records.